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**From:** Pankratz, Shannon L CIV USARMY CESPL (US) [Shannon.L.Pankratz@usace.army.mil]  
**Sent:** 6/21/2022 10:31:44 PM  
**To:** Stephanie Gad [gad@wra-ca.com]; Gymer, Lisa@Wildlife [Lisa.Gymer@wildlife.ca.gov]; Scianni, Melissa [Scianni.Melissa@epa.gov]; Tiffany Steinert [tiffany.steinert@waterboards.ca.gov]  
**CC:** Nate Bello [bello@wra-ca.com]; Marlene Tyner-Valencourt [tyner-valencourt@wra-ca.com]; Tracey Brownfield [tracey@landveritas.com]; Estes, Stephen M CIV USARMY CESPL (USA) [Stephen.M.Estes@usace.army.mil]; Troxel, Tiffany A CIV USARMY CESPL (USA) [Tiffany.A.Troxel@usace.army.mil]; Woodsmall, David@Wildlife [David.Woodsmall@wildlife.ca.gov]  
**Subject:** Re: PRMB Area F Spineflower Introduction Amendment  
**Attachments:** Exh K-15 Spineflower Intro Area Debits\_TrackedChange\_ACOE\_20220621.docx; PRMB amendment 2\_TrackedChange\_ACOE\_20220621.docx

Hello everyone,

Here are a few final comments (attached). Also, as a general comment, all terms defined in the BEI still need to be consistently capitalized throughout all exhibit documents.

Thanks,

Shannon L. Pankratz, D. Env.  
Senior Project Manager, Los Angeles and San Bernardino Counties Section  
North Coast Branch, Regulatory Division  
Los Angeles District, U.S. Army Corps of Engineers  
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[https://www.spl.usace.army.mil/Portals/17/docs/publicnotices/COVID19%20Regulatory\\_SPN.pdf?ver=2020-03-19-134532-833](https://www.spl.usace.army.mil/Portals/17/docs/publicnotices/COVID19%20Regulatory_SPN.pdf?ver=2020-03-19-134532-833)

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**From:** Stephanie Gad <gad@wra-ca.com>  
**Sent:** Tuesday, June 14, 2022 11:38 AM  
**To:** Pankratz, Shannon L CIV USARMY CESPL (US) <Shannon.L.Pankratz@usace.army.mil>; Gymer, Lisa@Wildlife <Lisa.Gymer@wildlife.ca.gov>; Melissa Scianni <scianni.melissa@epa.gov>; Tiffany Steinert <tiffany.steinert@waterboards.ca.gov>  
**Cc:** Nate Bello <bello@wra-ca.com>; Marlene Tyner-Valencourt <tyner-valencourt@wra-ca.com>; Tracey Brownfield <tracey@landveritas.com>; Estes, Stephen M CIV USARMY CESPL (USA) <Stephen.M.Estes@usace.army.mil>; Troxel, Tiffany A CIV USARMY CESPL (USA) <Tiffany.A.Troxel@usace.army.mil>; Woodsmall, David@Wildlife <David.Woodsmall@wildlife.ca.gov>  
**Subject:** [URL Verdict: Neutral][Non-DoD Source] Re: PRMB Area F Spineflower Introduction Amendment

Good morning IRT,

We've addressed your comments and edits in the Comment Response Matrix and the BEI documents sent on June 1 for all documents except the Area F CE. We have attached the clean and tracked changes word documents along with the comment response matrix to this email. These documents have also been uploaded to RIBITS along with the assembled PDFs. WRA is still coordinating with SRMA and Newhall on the outstanding question related to the easement compliance funding in the Area F CE and will send the revised Area F CE once this has been resolved.

The following documents have been revised as a result of the last round of IRT comment: BEI amendment, Exhibits C-1, D-5, F-1.1, K-15, the Lake Elizabeth Subordination Agreement, and Comment Response Matrix. No comments were received and no edits made to Exhibit E-3.1 from the May 2022 submittal.

Thank you and please feel free to reach out with any questions!  
Stephanie

On Fri, Jun 3, 2022 at 4:35 PM Nate Bello <bello@wra-ca.com> wrote:

Thank you Shannon and IRT for the quick turnaround on these comments.

We received the new set of comments and are working to address them. Newhall has made minor edits to the subordination agreement containing the IRT comments, which is attached here. Ahead of the next submission we also wanted to provide some responses to some of the comments to help clarify a few things.

- There was a comment from CDFW that they did not see the figures in the May submittal. The revised figures for Exhibits C-1, D-5, E-3.1, and F-1 were all included in the May 2022 submittal within the assembled PDF for each of the exhibits. We've also attached to this email a PDF of all the revised Figures for ease of reference.
- There was a comment from CDFW that Exhibit F-1.2 and F-1.3 were not included in the May submittal. These are components of Exhibit F-1 and were included in the pdfs that are on RIBITS.
- There were several comments about credit discrepancies of 0.01 acre. Since all credit types are rounded to two significant digits there will always be the potential for summed values in the tables to be +/- 0.01 since we are only working with 1 significant digit. For example, one of the comments is on the CEQA debits, looking at the table below you can see what the values would be like if displayed at 3 decimal places vs 2 decimal places.

Great Basin scrub	2.764	2.76
Seeps, meadows, marshes	0.571	0.57
Valley and foothill grassland	3.423	3.42
Grand Total	6.758	6.75

- There is a comment in the Development Plan exhibit C-1 Figure 17, which depicts the monitoring locations (transects, CRAM AAs and photopoints) at EL, stating that his figure needed all of the easements shown. It is not clear to me why this one figure depicting monitoring locations would need to show all of the easements. So wanted to confirm is the comment intended for Figure 17 from exhibit C-1?

Happy to get on a call and discuss any of these topics or any other topics.

Regards and have a great weekend!

Nate,

**Nathan Bello** | Conservation Biologist/Planner | d: 415.524.7238 | o: 415.454.8868 x 1800 | c: 916.508.4993 | bello@wra-ca.com

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On Wed, Jun 1, 2022 at 11:33 AM Pankratz, Shannon L CIV USARMY CESPL (US) <[Shannon.L.Pankratz@usace.army.mil](mailto:Shannon.L.Pankratz@usace.army.mil)> wrote:

Thank you Nate, please see the attached IRT responses (combined).

All the best,

Shannon L. Pankratz, D. Env.

Senior Project Manager, Los Angeles and San Bernardino Counties Section

North Coast Branch, Regulatory Division

Los Angeles District, U.S. Army Corps of Engineers

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**From:** Nate Bello <[bello@wra-ca.com](mailto:bello@wra-ca.com)>

**Sent:** Friday, May 20, 2022 3:26 PM

**To:** Pankratz, Shannon L CIV USARMY CESPL (US) <[Shannon.L.Pankratz@usace.army.mil](mailto:Shannon.L.Pankratz@usace.army.mil)>; Gymer, Lisa@Wildlife <[Lisa.Gymer@wildlife.ca.gov](mailto:Lisa.Gymer@wildlife.ca.gov)>; Melissa Scianni <[scianni.melissa@epa.gov](mailto:scianni.melissa@epa.gov)>; Tiffany Steinert <[tiffany.steinert@waterboards.ca.gov](mailto:tiffany.steinert@waterboards.ca.gov)>; Estes, Stephen M CIV USARMY CESPL (USA) <[Stephen.M.Estes@usace.army.mil](mailto:Stephen.M.Estes@usace.army.mil)>

**Cc:** Tracey Brownfield <[tracey@landveritas.com](mailto:tracey@landveritas.com)>; Stephanie Gad <[gad@wra-ca.com](mailto:gad@wra-ca.com)>; Marlene Tyner-Valencourt <[tyner-valencourt@wra-ca.com](mailto:tyner-valencourt@wra-ca.com)>

**Subject:** [URL Verdict: Neutral][Non-DoD Source] PRMB Area F Spineflower Introduction Amendment

Dear IRT,

We have addressed all of your comments and edits to the various BEI documents. We have attached here the clean and tracked changes word documents as well as a response to comments matrix that acts as a repository for all of your comments and our responses. The color coding is such that green cells are where we accepted your edits or made the requested edit to address your comment. The blue cells are where no edits were made. Purple cells are where we wanted to draw your attention to a specific response. In the clean folder you will also find a new document per the IRT's request; Exhibit K-15 which details the debited credits resulting from this amendment, this document is now referenced in Exhibit F-1. We have also uploaded all of these documents to RIBITS along with the assembled pdfs.

Please note there were a few minor changes made by Newhall to the CE, and they also let me know that the Subordination agreement had already been signed, so if at all possible they would like to keep it as-is. We have included on RIBITS the signed version.

Please feel free to reach out with any questions and I would be happy to have a meeting next week to go over anything the IRT would like to discuss.

Regards and have a great weekend!

Nate

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**Nathan Bello** | Conservation Biologist/Planner | d: 415.524.7238 | o: 415.454.8868 x 1800 | c: 916.508.4993 | [bello@wra-ca.com](mailto:bello@wra-ca.com)

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